Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of Service Rules for the 698-746, 747-762 and 777-792 MHz Bands	WT Docket No. 06-150
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems	CC Docket No. 94-102
	WT Docket No. 01-309
Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones	WT Docket No. 03-264
Biennial Regulatory Review – Amendment of Parts 1, 22, 24, 27, and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services	WT Docket No. 06-169
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules	PS Docket No. 06-229
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	WT Docket No. 96-86
Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010	

REPLY COMMENTS OF
MOBILE SATELLITE VENTURES SUBSIDIARY LLC

Mobile Satellite Ventures Subsidiary LLC ("MSV") hereby files these Reply Comments in response to the *Further Notice of Proposed Rulemaking* ("*FNPRM*") in connection with the above-referenced proceedings.[1] In its Comments, MSV supported the requirement on which the Commission sought comment in the *FNPRM* that all public safety user equipment in the "E Block" incorporate technology capable of accessing satellites. Comments filed by other parties confirm the value of integrating satellite communications with 700 MHz public safety user equipment to extend the reach of public safety communications and increase its reliability during disasters.

MSV's Comments focused on the Commission's question of whether "some or all public safety equipment operating on an 'E Block' built network [should] be capable of accessing satellite communications (including handsets and other mobile or fixed receivers)?" *FNPRM* at ¶ 280. MSV discussed the unique ability of satellites to provide nationwide broadband coverage and satellites' immunity to the kinds of natural or man-made disasters that affect terrestrial infrastructure. MSV described its discussions with equipment vendors confirming the feasibility of building satellite capability into every unit of 700 MHz public safety user equipment by adding small satellite-capable chipsets that can be produced in volume for a few dollars each. With newer satellites that have sufficient power to provide two-way mobile service to small, handheld terminals that are no bigger than today's conventional public safety radios, this approach would provide

[1] FCC 07-72 (April 27, 2007) ("*FNPRM*").

precisely the kind of ubiquitous, interoperable, and reliable public safety communications network that has been and otherwise will continue to be so elusive. MSV proposed that the Commission require that all terminals on the 700 MHz public safety broadband network have the capability of effectively providing mobile service by satellite by 2010. This will ensure that new public safety communications networks are providing truly nationwide service from the start. Moreover, to qualify as effective mobile service by satellite, the underlying satellite system should be required to provide coverage of all fifty states and be capable of providing priority and preemptive access to public safety users.

The comments filed by the Satellite Industry Association provide further support for mandating that 700 MHz public safety devices have the capability to access a satellite system. SIA cites the nationwide coverage, robustness, broadband capability, and interoperability provided by satellites.

The comments filed by various public safety entities focus on the ongoing problem of poor coverage for public safety communications, particularly of rural and remote areas and particularly for broadband service. The National Public Safety Telecommunications Council describes how, even with a build-out requirement of 99.3% of the United States population, a public safety broadband system would leave over 36% of the United States land mass uncovered, including 25% of the lower 48 states. Comments of NPSTC at p. 12. *See also* Comments of National Association of Telecommunications Officers and Advisors *et al.*, p. 7 and Appendix. Motorola and others cite the proposed elimination of wideband technology as

increasing the cost and reach of public safety systems. Comments of Motorola, Inc., pp. 17-18. All of this adds further weight to the value of the satellite solution raised by the Commission in the *FNPRM*. By adding a low-cost, high-performance satellite capability to 700 MHz public safety handsets, the coverage problem would be solved virtually immediately.

Respectfully submitted,

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